

FILED
STATE OF IOWA, COUNTY OF BLACK HAWK

2010 APR -7 AM 9:25

STATE OF IOWA

CLERK OF DISTRICT COURT CASE NO. AGCR 168181
 BLACK HAWK COUNTY, IOWA

V.

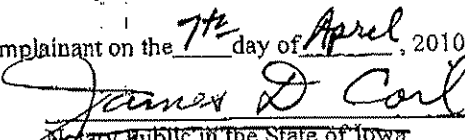
COMPLAINT, AFFIDAVIT and ORDER

ANGELA BIGELOW,
 DOB: 06/30/1971

Comes Now the State of Iowa and accuses Angela Bigelow of the crime of **Tampering with Records**, an aggravated misdemeanor, committed as follows: the defendant on or about the 2nd Day of August, 2007, in the County of Black Hawk, State of Iowa, did commit tampering with records relating to SLG in violation of Section 715A.5 of the Iowa Criminal Code.


 Complainant

Subscribed and sworn to before me by the said complainant on the 7th day of April, 2010.

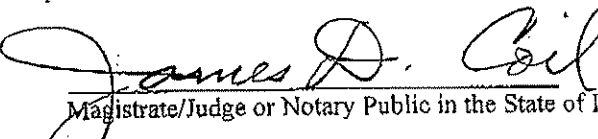

 Notary Public in the State of Iowa
 Judge

STATE OF IOWA,
 COUNTY OF BLACK HAWK, SS.

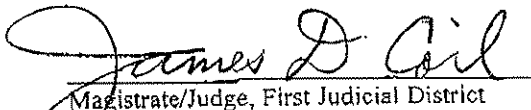
I, the undersigned, being first duly sworn and under oath, state that the following facts known by me or told to me by other reliable persons form the basis for my belief that the Defendant committed the crimes charged.
See Affidavit - Attachment A


 Affiant

Subscribed and sworn to before me by the said complainant on this 7th day of April 2010.


 Magistrate/Judge or Notary Public in the State of Iowa
ORDER

It is ordered that a summons be issued by the Clerk of Court to the defendant at the last known address setting an appearance on the above referenced charge for the 2nd day of April 2010 at 8:30 a.m./p.m.


 Magistrate/Judge, First Judicial District
 Black Hawk County, Iowa

Court _____

Police _____

Prosecutor _____

Defendant _____

FILED
IN THE IOWA DISTRICT COURT FOR BLACK HAWK COUNTY

STATE OF IOWA

2010 APR -7 AM 9:25

V.

CLERK OF DISTRICT COURT
BLACK HAWK COUNTY, IOWA

CASE NO. _____

AFFIDAVIT

ANGELA BIGELOW and CONNIE
BIGELOW

In March of 2009, information came to law enforcement that indicated a number of patrons of the Malcolm Price Laboratory School (K-6), hereinafter referred to as (PLS), located at the University of Northern Iowa were listing addresses on school records for their children that were false. The addresses were listed on enrollment and registration records of the PLS.

PLS is established pursuant to Iowa Code. PLS is an elementary school with a district or zone that is physically within the Cedar Falls School District. However, PLS is operated on a separate budget and is independent of Cedar Falls School District. NU High which is established under the same code section is likewise situated and operated.

Patrons of the PLS who live within a defined residential or buffer zone are allowed to send their children to the PLS for a fee of \$500 for the 2006/07 school year, \$526 for the 2007/08 school year and \$543 for the 2008/09 school year. Patrons who desire to send their children to PLS that live outside of the residential or buffer zone can do so by following the appropriate open enrollment procedure set by the Iowa Department of Education or by following a process called "tuitioning-in". For a patron to "tuition-in" a student must receive permission of the PLS administration and pay the "per pupil fee" set by the legislature. For the 2006/07 school year the per-pupil fee was \$5,135.00. For the 2007-2008 school year the "per-pupil fee" set by the legislature was \$5,333.00. For the 2008-2009 school year the "per pupil fee" set by the legislature was \$5,500.00.

Patrons who listed a false residential address for their children thereby gained an educational benefit for their child that would not have otherwise been available, avoided paying higher fees in the form of tuition and avoided having to following open enrollment procedures.

Prior to the 2008/09 school year patrons were required to complete registration of existing students by filling out hard copy forms. To register a student who was an existing PLS student a "Registration and Information" form was required to be filed with the school. The form required the parent's and student's residential address,

among other information. If the student was a first year student either beginning school or transferring from another district an "Enrollment Application and Transfer Form" was required to be filed with the school. Similar to the registration form, the parent's and student's residential address, among other information, was required.

Beginning with the 2008/09 school year PLS used a computerized program to register students. The name of the program was *Power Schools*. According to Aaron Spurr of PLS who oversees the operation of the computer system each family was assigned one password. The password could be used to access the school account to register a student for the school year. During the registration process the parent is required to provide the residential address of the student and parent. In setting the appropriate fee, PLS relied on the information provided by the parent registering the student. The passwords were unique to each family and not individuals. There would be no way of telling which parent or guardian accessed the account to register the student only that it had been accessed with the assigned password.

In March/April of 2009, agents with the Iowa Division of Criminal Investigation assisted by the State Auditor's investigators conducted an investigation into the alleged false records. Initially, the information concerning false addresses had been discovered in an internal audit conducted by the University of Northern Iowa. School documents were inspected and copied and interviews of certain individuals including administrative staff members, parents and community members were completed.

As it relates to the above referenced defendant the following information was learned.

Angela Bigelow resides at 318 West 5th Street, Cedar Falls, IA. Bigelow resides at the 5th Street address with her child SLG. Bigelow is unmarried. Bigelow has resided on West 5th Street for approximately 11 years. SLG's father is William Grover who resides at 2408 Woodland Drive, Cedar Falls, IA. To this affiant's knowledge SLG does not reside with her biological father. 318 West 5th Street, Cedar Falls, IA and the Woodland Drive address are outside the residential and buffer zone of PLS.

SLG has attended PLS since the 2006/07 school year.

On August 2, 2007, Angela Bigelow completed a form entitled "Registration Information". On the form Bigelow listed a residential address of 1211 West 19th Street, Cedar Falls, IA. The form also lists William Grover as living at 1211 West 19th Street, Cedar Falls, IA. Her true address and the true address of William Grover are not listed on the "Registration Information" form.

1211 West 19th Street, Cedar Falls, IA is an address within the residential zone of the PLS.

It was learned that Glenn and Fredda Holmes reside at 1211 West 19th Street, Cedar Falls, IA. The Holmes' have resided at this address since 1990 and are the Uncle

and Aunt of William Grover. In an interview they confirmed that SLG and William Grover had not ever resided with them on West 19th Street. Just before the interview with DCI Connie Bigelow was at their residence and told them that she had used their address for her granddaughter to attend the PLS. Connie Bigelow is the mother of Angela Bigelow and a secretary at PLS. It should be noted that agents who interviewed the Holmes observed Connie Bigelow driving away from their residence as they were arriving.

During an interview Angela Bigelow confirmed her address as stated above. Angela Bigelow stated that she was aware the address listed on her daughter's registration form was false. Angela Bigelow stated that her mother Connie wanted her daughter to attend school at PLS and told her what address to put on the form.

As a secretary for PLS, Connie Bigelow is aware of the fees and tuition of resident and non-resident students. According to former and current staff members at PLS it was common knowledge that Connie Bigelow's granddaughter attended PLS and paid the lower amount without living in the residential or buffer zone. Connie Bigelow in an interview admitted to knowing that a patron had to pay a higher amount if living outside the zone. Connie Bigelow claimed that William Grover had rented the property at 1211 West 19th Street Cedar Falls, IA. Connie Bigelow admitted to telling Angela Bigelow to record an incorrect address to allow SLG to attend PLS without paying the "tuition-in" amount. Connie Bigelow stated that the only ones who could afford the higher tuition were physicians.

As part of any registration a fee contract is to be executed by the parent and the school. Connie Bigelow's signature was confirmed on the fee contract for SLG for the 2007/08 school year.

Angela Bigelow's daughter resided outside the Price Laboratory School zone. Bigelow would be required to "tuition-in" her daughter SLG. If the proper tuition fee is applied, less the fees paid, Angela Bigelow would be billed \$5,135 for 2006/2007, \$5,333 for 2007/2008 and \$5,500 for 2008/2009 for a total bill of \$15,968.

IN THE IOWA DISTRICT COURT IN AND FOR BLACK HAWK COUNTY

STATE OF IOWA,)
)
Plaintiff,) Case No. 01071 AGCR168181
)
vs) SUMMONS
)
ANGELA LYN BIGELOW)
)
Defendant.)

TO: ANGELA LYN BIGELOW
318 W 5TH ST
CEDAR FALLS IA 50613

TO THE ABOVE NAMED INDIVIDUAL:

You are hereby ordered by the Court to appear on the first floor of the Black Hawk County Courthouse, Waterloo, Iowa, on the 22ND day of APRIL, 2010, at 8:30 A.M. for a INITIAL APPEARANCE with respect to a Complaint that has been filed charging you with the offense of TAMPERING W/RECORDS. You should report to the court attendant's desk outside the large courtroom on the first floor of the courthouse.

If you fail to so appear, a warrant for your arrest may be issued. Please take notice and govern yourself accordingly.

IT IS FURTHER ORDERED that the Black Hawk County Sheriff's Office provide the defendant with personal service of a copy of this order.

Dated 04/07/10



DISTRICT ASSOCIATE JUDGE/
MAGISTRATE

Copies to: Sheriff

FILED
STATE OF IOWA, COUNTY OF BLACK HAWK

2010 APR -7 AM 9:25

STATE OF IOWA

CLERK OF DISTRICT COURT
 BLACK HAWK COUNTY, IOWA

CASE NO. AGCR 16876

V.

COMPLAINT, AFFIDAVIT and ORDER

CONNIE ARLENE BIGELOW

DOB: 04/23/1947

Comes Now the State of Iowa and accuses Connie Bigelow of the crime of **Tampering with Records**, an aggravated misdemeanor, committed as follows: the defendant on or about the 2nd Day of August, 2007, in the County of Black Hawk, State of Iowa, did commit tampering with records relating to SLG in violation of Section 715A.5 of the Iowa Criminal Code.

Scot A. Breen
 Complainant

Subscribed and sworn to before me by the said complainant on the 7th day of April, 2010.

James D. Coil
 Notary Public in the State of Iowa
Judge

STATE OF IOWA,
 COUNTY OF BLACK HAWK, SS.

I, the undersigned, being first duly sworn and under oath, state that the following facts known by me or told to me by other reliable persons form the basis for my belief that the Defendant committed the crimes charged.
See Affidavit - Attachment A

Scot A. Breen
 Affiant

Subscribed and sworn to before me by the said complainant on this 7th day of April, 2010.

James D. Coil
 Magistrate/Judge or Notary Public in the State of Iowa

ORDER

It is ordered that a summons be issued by the Clerk of Court to the defendant at the last known address setting an appearance on the above referenced charge for the 2nd day of April, 2010 at 8:30 a.m./p.m.

James D. Coil
 Magistrate/Judge, First Judicial District
 Black Hawk County, Iowa

Court _____

Police _____

Prosecutor _____

Defendant _____

FILED
IN THE IOWA DISTRICT COURT FOR BLACK HAWK COUNTY

2010 APR -7 AM 9:25

STATE OF IOWA

CLERK OF DISTRICT COURT
BLACK HAWK COUNTY, IOWA

CASE NO. _____

V.

AFFIDAVIT

ANGELA BIGELOW and CONNIE
BIGELOW

In March of 2009, information came to law enforcement that indicated a number of patrons of the Malcolm Price Laboratory School (K-6), hereinafter referred to as (PLS), located at the University of Northern Iowa were listing addresses on school records for their children that were false. The addresses were listed on enrollment and registration records of the PLS.

PLS is established pursuant to Iowa Code. PLS is an elementary school with a district or zone that is physically within the Cedar Falls School District. However, PLS is operated on a separate budget and is independent of Cedar Falls School District. NU High which is established under the same code section is likewise situated and operated.

Patrons of the PLS who live within a defined residential or buffer zone are allowed to send their children to the PLS for a fee of \$500 for the 2006/07 school year, \$526 for the 2007/08 school year and \$543 for the 2008/09 school year. Patrons who desire to send their children to PLS that live outside of the residential or buffer zone can do so by following the appropriate open enrollment procedure set by the Iowa Department of Education or by following a process called "tuitioning-in". For a patron to "tuition-in" a student must receive permission of the PLS administration and pay the "per pupil fee" set by the legislature. For the 2006/07 school year the per-pupil fee was \$5,135.00. For the 2007-2008 school year the "per-pupil fee" set by the legislature was \$5,333.00. For the 2008-2009 school year the "per pupil fee" set by the legislature was \$5,500.00.

Patrons who listed a false residential address for their children thereby gained an educational benefit for their child that would not have otherwise been available, avoided paying higher fees in the form of tuition and avoided having to following open enrollment procedures.

Prior to the 2008/09 school year patrons were required to complete registration of existing students by filling out hard copy forms. To register a student who was an existing PLS student a "Registration and Information" form was required to be filed with the school. The form required the parent's and student's residential address,

among other information. If the student was a first year student either beginning school or transferring from another district an "Enrollment Application and Transfer Form" was required to be filed with the school. Similar to the registration form, the parent's and student's residential address, among other information, was required.

Beginning with the 2008/09 school year PLS used a computerized program to register students. The name of the program was *Power Schools*. According to Aaron Spurr of PLS who oversees the operation of the computer system each family was assigned one password. The password could be used to access the school account to register a student for the school year. During the registration process the parent is required to provide the residential address of the student and parent. In setting the appropriate fee, PLS relied on the information provided by the parent registering the student. The passwords were unique to each family and not individuals. There would be no way of telling which parent or guardian accessed the account to register the student only that it had been accessed with the assigned password.

In March/April of 2009, agents with the Iowa Division of Criminal Investigation assisted by the State Auditor's investigators conducted an investigation into the alleged false records. Initially, the information concerning false addresses had been discovered in an internal audit conducted by the University of Northern Iowa. School documents were inspected and copied and interviews of certain individuals including administrative staff members, parents and community members were completed.

As it relates to the above referenced defendant the following information was learned.

Angela Bigelow resides at 318 West 5th Street, Cedar Falls, IA. Bigelow resides at the 5th Street address with her child SLG. Bigelow is unmarried. Bigelow has resided on West 5th Street for approximately 11 years. SLG's father is William Grover who resides at 2408 Woodland Drive, Cedar Falls, IA. To this affiant's knowledge SLG does not reside with her biological father. 318 West 5th Street, Cedar Falls, IA and the Woodland Drive address are outside the residential and buffer zone of PLS.

SLG has attended PLS since the 2006/07 school year.

On August 2, 2007, Angela Bigelow completed a form entitled "Registration Information". On the form Bigelow listed a residential address of 1211 West 19th Street, Cedar Falls, IA. The form also lists William Grover as living at 1211 west 19th Street, Cedar Falls, IA. Her true address and the true address of William Grover are not listed on the "Registration Information" form.

1211 West 19th Street, Cedar Falls, IA is an address within the residential zone of the PLS.

It was learned that Glenn and Fredda Holmes reside at 1211 West 19th Street, Cedar Falls, IA. The Holmes' have resided at this address since 1990 and are the Uncle

and Aunt of William Grover. In an interview they confirmed that SLG and William Grover had not ever resided with them on West 19th Street. Just before the interview with DCI Connie Bigelow was at their residence and told them that she had used their address for her granddaughter to attend the PLS. Connie Bigelow is the mother of Angela Bigelow and a secretary at PLS. It should be noted that agents who interviewed the Holmes observed Connie Bigelow driving away from their residence as they were arriving.

During an interview Angela Bigelow confirmed her address as stated above. Angela Bigelow stated that she was aware the address listed on her daughter's registration form was false. Angela Bigelow stated that her mother Connie wanted her daughter to attend school at PLS and told her what address to put on the form.

As a secretary for PLS, Connie Bigelow is aware of the fees and tuition of resident and non-resident students. According to former and current staff members at PLS it was common knowledge that Connie Bigelow's granddaughter attended PLS and paid the lower amount without living in the residential or buffer zone. Connie Bigelow in an interview admitted to knowing that a patron had to pay a higher amount if living outside the zone. Connie Bigelow claimed that William Grover had rented the property at 1211 West 19th Street Cedar Falls, IA. Connie Bigelow admitted to telling Angela Bigelow to record an incorrect address to allow SLG to attend PLS without paying the "tuition-in" amount. Connie Bigelow stated that the only ones who could afford the higher tuition were physicians.

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Angela Bigelow's daughter resided outside the Price Laboratory School zone. Bigelow would be required to "tuition-in" her daughter SLG. If the proper tuition fee is applied, less the fees paid, Angela Bigelow would be billed \$5,135 for 2006/2007, \$5,333 for 2007/2008 and \$5,500 for 2008/2009 for a total bill of \$15,968.

IN THE IOWA DISTRICT COURT IN AND FOR BLACK HAWK COUNTY

STATE OF IOWA,)	
)	
Plaintiff,)	Case No. 01071 AGCR168176
)	
vs)	SUBPOENA
)	
CONNIE A BIGELOW)	
)	
Defendant.)	

TO: CONNIE A BIGELOW
1716 W 18TH ST APT 201
CEDAR FALLS IA 50613

TO THE ABOVE NAMED INDIVIDUAL:

You are hereby ordered by the Court to appear on the first floor of the Black Hawk County Courthouse, Waterloo, Iowa, on the 22ND day of APRIL, 2010, at 8:30 A.M. for a INITIAL APPEARANCE with respect to a Complaint that has been filed charging you with the offense of TAMPERING W/RECORDS. You should report to the court attendant's desk outside the large courtroom on the first floor of the courthouse.

If you fail to so appear, a warrant for your arrest may be issued. Please take notice and govern yourself accordingly.

IT IS FURTHER ORDERED that the Black Hawk County Sheriff's Office provide the defendant with personal service of a copy of this order.

Dated 04/07/10 .

James D. Coil

DISTRICT ASSOCIATE JUDGE/
MAGISTRATE

Copies to: Sheriff

FILED
STATE OF IOWA, COUNTY OF BLACK HAWK

2010 APR -7 AM 9:24

STATE OF IOWA

CLERK OF DISTRICT COURT
BLACK HAWK COUNTY, IOWA

CASE NO. AGCR162174

V.

COMPLAINT, AFFIDAVIT and ORDER

KERRY LYNN BURT,DOB: 12/17/64,Count One

Comes Now the State of Iowa and accuses Kerry Lynn Burt of the crime of Tampering with Records, an aggravated misdemeanor, committed as follows: the defendant on or about August 16, 2007, in the County of Black Hawk, State of Iowa, did commit tampering with records relating to STB in violation of Section 715A.5 of the Iowa Criminal Code.

Count Two

Comes Now the State of Iowa and accuses Kerry Lynn Burt of the crime of Tampering with Records, an aggravated misdemeanor, committed as follows: the defendant on or about August 16, 2007, in the County of Black Hawk, State of Iowa, did commit tampering with records relating to ICB in violation of Section 715A.5 of the Iowa Criminal Code.

[Signature]
 Complainant

Subscribed and sworn to before me by the said complainant on the 7th day of April, 2010.

[Signature]
 Notary Public in the State of Iowa

[Signature]
 Judge

STATE OF IOWA,
 COUNTY OF BLACK HAWK, SS.

I, the undersigned, being first duly sworn and under oath, state that the following facts known by me or told to me by other reliable persons form the basis for my belief that the Defendant committed the crimes charged.
See Affidavit - Attachment A

[Signature]
 Affiant

Subscribed and sworn to before me by the said complainant on this 7th day of April, 2010.

[Signature]
 Magistrate/Judge or Notary Public in the State of Iowa

ORDER

It is ordered that a summons be issued by the Clerk of Court to the defendant at the last known address setting an appearance on the above referenced charge for the 22nd day of April, 2010 at 8:30 a.m./p.m.

[Signature]
 Magistrate/Judge, First Judicial District
 Black Hawk County, Iowa

Court _____

Police _____

Prosecutor _____

Defendant _____

FILED

IN THE IOWA DISTRICT COURT FOR BLACK HAWK COUNTY
2010 APR -7 AM 9:24

STATE OF IOWA

CLERK OF DISTRICT COURT
BLACK HAWK COUNTY, IOWA

V.

CASE NO. _____

AFFIDAVIT

KERRY LYNN BURT

In March of 2009, information came to law enforcement that indicated a number of patrons of the Malcolm Price Laboratory School (K-6), hereinafter referred to as (PLS), located at the University of Northern Iowa were listing addresses on school records for their children that were false. The addresses were listed on enrollment and registration records of the PLS.

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required to be filed with the school. Similar to the registration form, the parent's and student's residential address, among other information, was required.

Beginning with the 2008/09 school year PLS used a computerized program to register students. The name of the program was *Power Schools*. According to Aaron Spurr of PLS who oversees the operation of the computer system each family was assigned one password. The password could be used to access the school account to register a student for the school year. During the registration process the parent is required to provide the residential address of the student and parent. In setting the appropriate fee, PLS relied on the information provided by the parent registering the student. The passwords were unique to each family and not individuals. There would be no way of telling which parent or guardian accessed the account to register the student only that it had been accessed with the assigned password.

In March/April of 2009, agents with the Iowa Division of Criminal Investigation assisted by the State Auditor's investigators conducted an investigation into the alleged false records. Initially, the information concerning false addresses had been discovered in an internal audit conducted by the University of Northern Iowa. School documents were inspected and copied and interviews of certain individuals including administrative staff members, parents and community members were completed.

As it relates to the above referenced defendant the following information was learned.

Kerry Lynn Burt resides at 150 Hawthorne Avenue in Waterloo, IA. He resides at the address with his wife and two children, STB and ICB. It was learned that Burt has resided at this address for the past 13 years.

One or more of the Burt children have attended PLS since the 2003/04 school year.

Burt claims to have attempted to open enroll his children from the Waterloo Community District into PLS. However, there is no record that would confirm this attempt from PLS or the Waterloo Community School District.

On August 16, 2007, Kerry Burt completed a form entitled "Enrollment Application and Transfer Form" to apply for the admission of STB into PLS. On the form Burt listed an address for STB of 1815 Franklin Street, Cedar Falls, IA. Burt also completed a form dated August 16, 2007, for STB entitled "Registration Information". On the form Burt listed a residential address of 1815 Franklin Street, Cedar Falls, IA for himself and for STB.

Burt completed a form dated August 16, 2007, for ICB entitled "Registration Information". On the form Burt listed a residential address of 1815 Franklin Street, Cedar Falls, IA for himself and for ICB.

1815 Franklin Street, Cedar Falls, IA is an address within the residential zone of the PLS.

The address of 1815 Franklin Street belongs to Marguerite Pircer. Ms. Pircer is an acquaintance of Kerry Burt. Ms. Pircer indicated that the defendant and the Burt children have never resided at her home on Franklin Street. Ms. Pircer indicated that she would occasionally receive mail for the children at her address which she would forward to the defendant.

The defendant was interviewed by an agent with the Iowa DCI. During the interview the defendant admitted to using the address on Franklin Street to obtain residential status for his children. The defendant indicated that everyone at the school was aware of his actual address and he never tried to conceal it from anyone at the school.

It appears from school records obtained during the investigation that the defendant has always maintained on official school records that his children reside at 1815 Franklin Street in Cedar Falls, IA.

Based upon the auditor's findings, it was determined that Burt used a false address beginning in the 2003/04 school year through 2008/09. It was determined that Burt owes \$37,139 (thirty-seven thousand one hundred thirty-nine dollars) to the Price Lab Schools in proper tuition and registration fees.

IN THE IOWA DISTRICT COURT IN AND FOR BLACK HAWK COUNTY

STATE OF IOWA,)
)
 Plaintiff,) Case No. 01071 AGCR168174
)
 vs) SUMMONS
)
KERRY LYNN BURT)
)
 Defendant.)

TO: KERRY LYNN BURT
150 HAWTHORNE AVE
WATERLOO IA 50702

TO THE ABOVE NAMED INDIVIDUAL:

You are hereby ordered by the Court to appear on the first floor of the Black Hawk County Courthouse, Waterloo, Iowa, on the 22ND day of APRIL , 2010 , at 8:30 A.M. for a INITIAL APPEARANCE with respect to a Complaint that has been filed charging you with the offense of TAMPERING W/RECORDS . You should report to the court attendant's desk outside the large courtroom on the first floor of the courthouse.

If you fail to so appear, a warrant for your arrest may be issued. Please take notice and govern yourself accordingly.

IT IS FURTHER ORDERED that the Black Hawk County Sheriff's Office provide the defendant with personal service of a copy of this order.

Dated 04/07/10 .



DISTRICT ASSOCIATE JUDGE/
MAGISTRATE

Copies to: Sheriff

FILED
STATE OF IOWA, COUNTY OF BLACK HAWK

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STATE OF IOWA

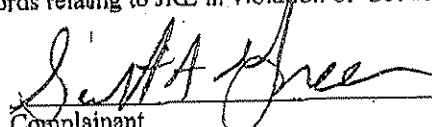
CLERK OF DISTRICT COURT CASE NO. ACC2168179
 BLACK HAWK COUNTY, IOWA

V.

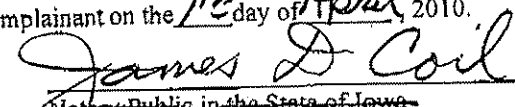
COMPLAINT, AFFIDAVIT and ORDER

FLORA DEKOCK,
 DOB: 10/10/1977

Comes Now the State of Iowa and accuses Flora DeKock of the crime of **Tampering with Records**, an aggravated misdemeanor, committed as follows: the defendant on or about the 16th Day of July, 2007, in the County of Black Hawk, State of Iowa, did commit tampering with records relating to JRL in violation of Section 715A.5 of the Iowa Criminal Code.

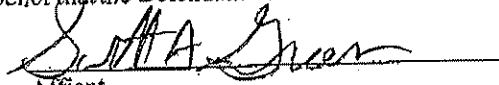

 Complainant

Subscribed and sworn to before me by the said complainant on the 7th day of April, 2010.

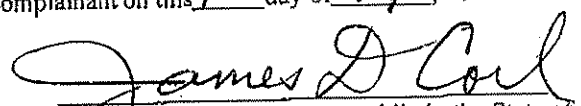

 Notary Public in the State of Iowa
 Judge

STATE OF IOWA,
 COUNTY OF BLACK HAWK, SS.

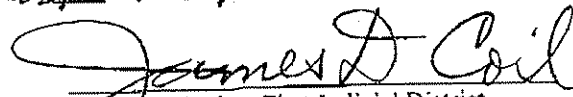
I, the undersigned, being first duly sworn and under oath, state that the following facts known by me or told to me by other reliable persons form the basis for my belief that the Defendant committed the crimes charged.
See Affidavit - Attachment A


 Affiant

Subscribed and sworn to before me by the said complainant on this 7th day of April, 2010.


 Magistrate/Judge or Notary Public in the State of Iowa
ORDER

It is ordered that a summons be issued by the Clerk of Court to the defendant at the last known address setting an appearance on the above referenced charge for the 12th day of April, 2010 at 8:30 a.m./p.m.


 Magistrate/Judge, First Judicial District
 Black Hawk County, Iowa

Court _____ Police _____ Prosecutor _____ Defendant _____

FILED

IN THE IOWA DISTRICT COURT FOR BLACK HAWK COUNTY

2010 APR -7 AM 9:25

STATE OF IOWA

CLERK OF DISTRICT COURT
BLACK HAWK COUNTY, IOWA

CASE NO. _____

V.

AFFIDAVIT

FLORA DEKOCK

In March of 2009, information came to law enforcement that indicated a number of patrons of the Malcolm Price Laboratory School (K-6), hereinafter referred to as (PLS), located at the University of Northern Iowa were listing addresses on school records for their children that were false. The addresses were listed on enrollment and registration records of the PLS.

PLS is established pursuant to Iowa Code. PLS is an elementary school with a district or zone that is physically within the Cedar Falls School District. However, PLS is operated on a separate budget and is independent of Cedar Falls School District. NU High which is established under the same code section is likewise situated and operated.

Patrons of the PLS who live within a defined residential or buffer zone are allowed to send their children to the PLS for a fee of \$500 for the 2006/07 school year, \$526 for the 2007/08 school year and \$543 for the 2008/09 school year. Patrons who desire to send their children to PLS that live outside of the residential or buffer zone can do so by following the appropriate open enrollment procedure set by the Iowa Department of Education or by following a process called "tuitioning-in". For a patron to "tuition-in" a student must receive permission of the PLS administration and pay the "per pupil fee" set by the legislature. For the 2006/07 school year the per-pupil fee was \$5,135.00. For the 2007-2008 school year the "per-pupil fee" set by the legislature was \$5,333.00. For the 2008-2009 school year the "per pupil fee" set by the legislature was \$5,500.00.

Patrons who listed a false residential address for their children thereby gained an educational benefit for their child that would not have otherwise been available, avoided paying higher fees in the form of tuition and avoided having to following open enrollment procedures.

Prior to the 2008/09 school year patrons were required to complete registration of existing students by filling out hard copy forms. To register a student who was an existing PLS student a "Registration and Information" form was required to be filed with the school. The form required the parent's and student's residential address, among other information. If the student was a first year student either beginning school or transferring from another district an "Enrollment Application and Transfer Form" was

required to be filed with the school. Similar to the registration form, the parent's and student's residential address, among other information, was required.

Beginning with the 2008/09 school year PLS used a computerized program to register students. The name of the program was *Power Schools*. According to Aaron Spurr of PLS who oversees the operation of the computer system each family was assigned one password. The password could be used to access the school account to register a student for the school year. During the registration process the parent is required to provide the residential address of the student and parent. In setting the appropriate fee, PLS relied on the information provided by the parent registering the student. The passwords were unique to each family and not individuals. There would be no way of telling which parent or guardian accessed the account to register the student only that it had been accessed with the assigned password.

In March/April of 2009, agents with the Iowa Division of Criminal Investigation assisted by the State Auditor's investigators conducted an investigation into the alleged false records. Initially, the information concerning false addresses had been discovered in an internal audit conducted by the University of Northern Iowa. School documents were inspected and copied and interviews of certain individuals including administrative staff members, parents and community members were completed.

As it relates to the above referenced defendant the following information was learned.

In school year 2007/08 Flora DeKock resided at 929 Rainbow Drive, Cedar Falls, IA. She resided at the address with her son JRL. The Rainbow Drive address is not in the residential or buffer zone of PLS. Currently Flora DeKock resides at 1207 West 19th Street, Cedar Falls, IA. which is in the residential zone of PLS.

JRL has attended PLS since the 2005/06 school year.

On July 16, 2007, Flora DeKock completed the "Registration Information" form to enroll JRL at PLS. On the form DeKock listed a residential address for JRL of 1210 West 19th Street, Cedar, Falls, IA. DeKock listed her address at 929 Rainbow Drive, Cedar Falls, IA.

1210 West 19th Street Cedar Falls, IA is an address within the residential zone of the PLS.

The address of 1210 West 19th Street belongs to Walter DeKock who is the father of Flora DeKock. Mr. DeKock indicated that the defendant and JRL have never resided at his home on West 19th Street. Mr. DeKock indicated that he would occasionally receive mail for JRL at his address which he would forward to the defendant. Mr. DeKock also stated that he never had any type of guardianship of JRL.

The defendant was interviewed by an agent with the Iowa DCI. During the interview the defendant admitted to using the address 1210 West 19th Street to obtain residential status for her child in the 2007/08 school year. The defendant indicated that she believed everyone at the school was aware of her actual address.

It appears from school records obtained during the investigation that the defendant has always maintained on official school records that her child resides at 1210 West 19th Street in Cedar Falls, IA until she moved to 1207 West 19th Street, Cedar Falls, IA

Flora DeKock resided outside the PLS zone in 2007/2008 and was not eligible for open enrollment and should have "tuitioned-in" and been charged a higher fee. When proper fees are applied for the school years 2005/2006 through 2007/2008 the total owed is \$15,406 minus the previous fees applied of \$1,501.

IN THE IOWA DISTRICT COURT IN AND FOR BLACK HAWK COUNTY

STATE OF IOWA,)
)
Plaintiff,) Case No. 01071 AGCR168179
)
vs) SUMMONS
)
FLORA LANGEL JOYCE DEKOCK)
)
Defendant.)

TO: FLORA LANGEL JOYCE DEKOCK
1207 W 19TH ST
CEDAR FALLS IA 50613

TO THE ABOVE NAMED INDIVIDUAL:

You are hereby ordered by the Court to appear on the first floor of the Black Hawk County Courthouse, Waterloo, Iowa, on the 22nd day of APRIL, 2010, at 9:30 A.M. for a INITIAL APPEARANCE with respect to a Complaint that has been filed charging you with the offense of TAMPERING W/RECORDS. You should report to the court attendant's desk outside the large courtroom on the first floor of the courthouse.

If you fail to so appear, a warrant for your arrest may be issued. Please take notice and govern yourself accordingly.

IT IS FURTHER ORDERED that the Black Hawk County Sheriff's Office provide the defendant with personal service of a copy of this order.

Dated 04/07/10



DISTRICT ASSOCIATE JUDGE/
MAGISTRATE

Copies to: Sheriff

FILED
STATE OF IOWA, COUNTY OF BLACK HAWK

2010 APR -7 AM 9:27

STATE OF IOWA

CLERK OF DISTRICT COURT
BLACK HAWK COUNTY, IOWA

CASE NO. AGCR 168182

V.

COMPLAINT, AFFIDAVIT and ORDER

KRISTI ANN EASTMAN,

DOB: 03/07/1969

Count One

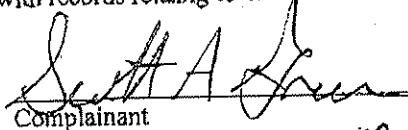
Comes Now the State of Iowa and accuses Kristi A. Eastman of the crime of **Tampering with Records**, an aggravated misdemeanor, committed as follows: the defendant on or about the 1st Day of September, 2008, in the County of Black Hawk, State of Iowa, did commit tampering with records relating to LE in violation of Section 715A.5 of the Iowa Criminal Code.

Count Two

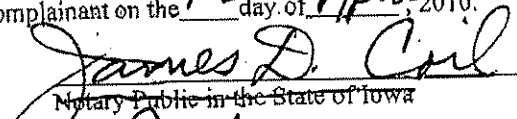
Comes Now the State of Iowa and accuses Kristi A. Eastman of the crime of **Tampering with Records**, an aggravated misdemeanor, committed as follows: the defendant on or about the 1st day of September, 2008, in the County of Black Hawk, State of Iowa, did commit tampering with records relating to CE in violation of Section 715A.5 of the Iowa Criminal Code.

Count Three

Comes Now the State of Iowa and accuses Kristi A. Eastman of the crime of **Tampering with Records**, an aggravated misdemeanor, committed as follows: the defendant on or about the 1st day of September, 2008, in the County of Black Hawk, State of Iowa, did commit tampering with records relating to WWE in violation of Section 715A.5 of the Iowa Criminal Code.

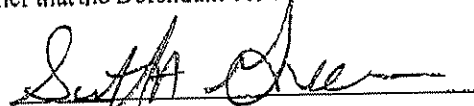

Complainant

Subscribed and sworn to before me by the said complainant on the 7th day of April, 2010.

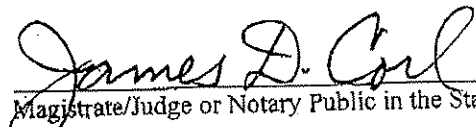

Notary Public in the State of Iowa
Judge

STATE OF IOWA,
COUNTY OF BLACK HAWK, SS.

I, the undersigned, being first duly sworn and under oath, state that the following facts known by me or told to me by other reliable persons form the basis for my belief that the Defendant committed the crimes charged.
See Affidavit - Attachment A


Affiant

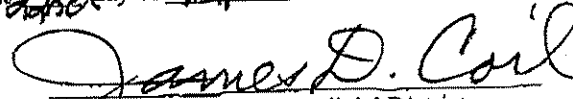
Subscribed and sworn to before me by the said complainant on this 7th day of April, 2010.


Magistrate/Judge or Notary Public in the State of Iowa

Court _____ Police _____ Prosecutor _____ Defendant _____

ORDER

It is ordered that a summons be issued by the Clerk of Court to the defendant at the last known address setting an appearance on the above referenced charge for the 23rd day of April 2010 at 8:30 a.m./p.m.


Magistrate/Judge, First Judicial District
Black Hawk County, Iowa

Court_____

Police_____

Prosecutor_____

Defendant_____

FILED
IN THE IOWA DISTRICT COURT FOR BLACK HAWK COUNTY

2010 APR -7 AM 9:27

STATE OF IOWA

CLERK OF DISTRICT COURT
BLACK HAWK COUNTY, IOWA

CASE NO. _____

V.

AFFIDAVIT

TODD T. EASTMAN and
KRISTI ANN EASTMAN

In March of 2009, information came to law enforcement that indicated some patrons of the Malcolm Price Laboratory School (K-6), hereinafter referred to as (PLS), located at the University of Northern Iowa were listing addresses on school records for their children that were false. The addresses were listed on enrollment and registration forms provided by the PLS.

PLS is established pursuant to Iowa Code. PLS is an elementary school with a district or zone that is physically completely within the Cedar Falls School District. However, PLS is operated on a separate budget and is independent of Cedar Falls School District. NU High which is established under the same code section is likewise situated and operated.

Patrons of the PLS who live within a defined residential or buffer zone are allowed to send their children to the PLS for a fee of \$500. Patrons who desire to send their children to PLS that live outside of the residential or buffer zone can do so by following the appropriate open enrollment procedure set by the Iowa Department of Education or by following a process called "tuitioning in". For a patron to "tuition-in" a student they must receive permission of PLS administration and pay the "per pupil fee" set by the legislature. For the 2007-2008 school year the "per pupil fee" set by the legislature was \$5,333.00. For the 2008-2009 school year the "per pupil fee" set by the legislature was \$

Patrons who listed a false residential address for their children thereby gained an educational benefit for their child that would not have otherwise been available, avoided paying higher fees in the form of tuition and avoided having to following open enrollment procedures.

In the 2008/09 school year PLS began using a computerized program to register students. The name of the program was Power Schools. According to Aaron Spur of PLS who oversees the operation of the computer system each family was assigned one password. The password could be used to access the school account to register a student for the school year. The school relied on the information provided by the patron registering the student. The passwords were unique to each family and not

individuals. There would be no way of telling which parent or guardian accessed the account to register student only that it had been accessed with the assigned password.

In March/April of 2009, agents with the Iowa Division of Criminal Investigation assisted by the State Auditor's investigators conducted an investigation into the listing of the false address. School documents were inspected and copied and interviews of certain individuals including administrative staff members, parents and community members were completed.

As it relates to the above referenced defendant the following information was learned.

Todd T. and Kristi Ann Eastman reside at 1491 Newell Street in Waterloo, IA. Neither Todd or Kristi Eastman have ever resided at 1615 or 1611 Washington Street in Cedar Falls, IA. Both addresses belong to Barry Eastman, Todd Eastman's older brother. The Eastman's reside at the Newell Street address with their children LE, CE and WWE. It was learned that the Eastman's have resided at the Newell address for approximately the past 10 years.

One or more of the Eastman children have attended PLS since the 2006/07 school year.

The defendants never attempted to open enroll their children from the Waterloo Community School District into PLS. This information was confirmed by Laurie Wery of the Waterloo Community School District who indicated as such to Linda Nielsen, the University of Iowa internal auditor.

Either Todd or Kristi Eastman accessed the Power Schools account to register each of their children, LE, CE and WWE at PLS for the 2008/09 school year. On past registrations the parent registering the children was Kristi Eastman. The only persons able to access and register the children listed below are the defendants Todd and Kristi Eastman.

A document generated by *Power Schools* entitled "Demographics" for the 08/09 school year lists a residential address for LE as 1615 Washington Street, Cedar Falls, IA. The demographics of an individual student are a record maintained electronically by the PLS computer system.

A document generated by *Power Schools* entitled "Demographics" for the 08/09 school year lists a residential address for CE as 1615 Washington Street, Cedar Falls, IA.

A document generated by *Power Schools* entitled "Demographics" for the 08/09 school year lists a residential address for WWE as 1615 Washington Street, Cedar Falls, IA.

1615 Washington Street, Cedar Falls, IA is an address within the residential zone of the PLS.

The only source of the information entered into *Power Schools* whereby the demographic document was generated would be Todd and Kristi Eastman.

During an interview Kristi Eastman stated that she and her husband are living apart and that Todd Eastman resided, at least part of the time with the children, at 1615 Washington Street. During the interview she was unable to provide verification.

In 2008 when the children were registered with the PLS, a letter dated September 11, 2008, was sent from Dave Smith, Director of PLS, to both Todd and Kristi Eastman requesting they send verification as to their address of 1615 Washington. In an e-mail and attachment sent back to the school on September 17, 2008, Kristi Eastman provided a bank statement from Lincoln Savings Bank in Reinbeck, IA indicating an address of 1615 Washington Street, Cedar Falls, IA. The bank statement was titled in the names of Todd and Kristi Eastman.

In March of 2009, Todd Eastman obtained a driver's license with the residential address of 1615 Washington, Cedar Falls, IA despite the fact that he did not reside at that address. In letter dated September 11, 2008, a driver's license was a form of address verification requested by PLS. Mr. Eastman during an interview indicated that he resided, at least part time, at 1615 Washington Street, Cedar Falls, IA. He also indicated that there was a second dwelling at 1611 Washington Street, Cedar Falls, IA. During his interview Mr. Eastman stated that when his children visited him at the Washington Street residence they would stay at the property located at 1611 Washington Street. It was learned during the investigation that this was untrue. Alissa Wagner has rented the house at 1611 Washington from Barry Eastman since July of 2008. During the time she rented the property Todd Eastman has never resided there nor is she familiar with Todd Eastman or his children.

The address of 1615 Washington Street belongs to Barry Eastman. Barry Eastman indicated that the defendant and the Eastman children have never resided at either 1615 or 1611 Washington Street, Cedar Falls, IA. Barry Eastman indicated that he would occasionally receive mail for the children at his address which he would forward to the defendant. Prior to receiving the mail for the children he was told by Todd Eastman that he would be receiving mail for them from the PLS school.

Beginning with the 2006/07 and ending with the 2008/09 school year it was determined, based upon the proper per pupil fee, the Eastman's owed \$33,755 to the PLS.

IN THE IOWA DISTRICT COURT IN AND FOR BLACK HAWK COUNTY

STATE OF IOWA,)
)
Plaintiff,) Case No. 01071 AGCR168182
)
vs) SUMMONS
)
KRISTI ANN EASTMAN)
)
Defendant.)

TO: KRISTI ANN EASTMAN
1491 NEWELL ST
WATERLOO IA 50703

TO THE ABOVE NAMED INDIVIDUAL:

You are hereby ordered by the Court to appear on the first
floor of the Black Hawk County Courthouse, Waterloo, Iowa, on the
22ND day of APRIL , 2010 , at 9:30 A.M. for a
INITIAL APPEARANCE with respect to a Complaint that has been
filed charging you with the offense of TAMPERING W/RECORDS .
You should report to the court attendant's desk outside the large
courtroom on the first floor of the courthouse.

If you fail to so appear, a warrant for your arrest may be
issued. Please take notice and govern yourself accordingly.

IT IS FURTHER ORDERED that the Black Hawk County Sheriff's
Office provide the defendant with personal service of a copy of
this order.

Dated 04/07/10 .



DISTRICT ASSOCIATE JUDGE/
MAGISTRATE

Copies to: Sheriff

FILED
STATE OF IOWA, COUNTY OF BLACK HAWK

2010 APR -7 AM 9:25

STATE OF IOWA

CLERK OF DISTRICT COURT CASE NO. AGCR2168180
 BLACK HAWK COUNTY, IOWA

COMPLAINT, AFFIDAVIT and ORDER

V:

TODD TIMOTHY EASTMAN,

DOB: 12/31/1966

Count One

Comes Now the State of Iowa and accuses Todd T. Eastman of the crime of **Tampering with Records**, an aggravated misdemeanor, committed as follows: the defendant on or about the 1st Day of September, 2008, in the County of Black Hawk, State of Iowa, did commit tampering with records relating to LE in violation of Section 715A.5 of the Iowa Criminal Code.

Count Two

Comes Now the State of Iowa and accuses Todd T. Eastman of the crime of **Tampering with Records**, an aggravated misdemeanor, committed as follows: the defendant on or about the 1st day of September, 2008, in the County of Black Hawk, State of Iowa, did commit tampering with records relating to CE in violation of Section 715A.5 of the Iowa Criminal Code.

Count Three

Comes Now the State of Iowa and accuses Todd T. Eastman of the crime of **Tampering with Records**, an aggravated misdemeanor, committed as follows: the defendant on or about the 1st day of September, 2008, in the County of Black Hawk, State of Iowa, did commit tampering with records relating to WWE in violation of Section 715A.5 of the Iowa Criminal Code.

Scott A. Price
 Complainant

Subscribed and sworn to before me by the said complainant on the 7th day of April, 2010.

James D. Coel
 Notary Public in the State of Iowa

STATE OF IOWA,
 COUNTY OF BLACK HAWK, SS.

I, the undersigned, being first duly sworn and under oath, state that the following facts known by me or told to me by other reliable persons form the basis for my belief that the Defendant committed the crimes charged.
See Affidavit - Attachment A

Scott A. Price
 Affiant

Subscribed and sworn to before me by the said complainant on this 7th day of April, 2010.

James D. Coel
 Magistrate/Judge or Notary Public in the State of Iowa

Court _____

Police _____

Prosecutor _____

Defendant _____

ORDER

It is ordered that a summons be issued by the Clerk of Court to the defendant at the last known address setting an appearance on the above referenced charge for the 22nd day of April 2010 at 8:30 a.m./p.m.

James D. Coil
Magistrate/Judge, First Judicial District
Black Hawk County, Iowa

Court_____

Police_____

Prosecutor_____

Defendant_____

FILED
IN THE IOWA DISTRICT COURT FOR BLACK HAWK COUNTY

2010 APR -7 AM 9:25

STATE OF IOWA

CLERK OF DISTRICT COURT
BLACK HAWK COUNTY, IOWA

CASE NO. _____

V.

AFFIDAVIT

TODD T. EASTMAN and
KRISTI ANN EASTMAN

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Patrons who listed a false residential address for their children thereby gained an educational benefit for their child that would not have otherwise been available, avoided paying higher fees in the form of tuition and avoided having to following open enrollment procedures.

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One or more of the Eastman children have attended PLS since the 2006/07 school year.

The defendants never attempted to open enroll their children from the Waterloo Community School District into PLS. This information was confirmed by Laurie Wery of the Waterloo Community School District who indicated as such to Linda Nielsen, the University of Iowa internal auditor.

Either Todd or Kristi Eastman accessed the Power Schools account to register each of their children, LE, CE and WWE at PLS for the 2008/09 school year. On past registrations the parent registering the children was Kristi Eastman. The only persons able to access and register the children listed below are the defendants Todd and Kristi Eastman.

A document generated by *Power Schools* entitled "Demographics" for the 08/09 school year lists a residential address for LE as 1615 Washington Street, Cedar Falls, IA. The demographics of an individual student are a record maintained electronically by the PLS computer system.

A document generated by *Power Schools* entitled "Demographics" for the 08/09 school year lists a residential address for CE as 1615 Washington Street, Cedar Falls, IA.

A document generated by *Power Schools* entitled "Demographics" for the 08/09 school year lists a residential address for WWE as 1615 Washington Street, Cedar Falls, IA.

1615 Washington Street, Cedar Falls, IA is an address within the residential zone of the PLS.

The only source of the information entered into *Power Schools* whereby the demographic document was generated would be Todd and Kristi Eastman.

During an interview Kristi Eastman stated that she and her husband are living apart and that Todd Eastman resided, at least part of the time with the children, at 1615 Washington Street. During the interview she was unable to provide verification.

In 2008 when the children were registered with the PLS, a letter dated September 11, 2008, was sent from Dave Smith, Director of PLS, to both Todd and Kristi Eastman requesting they send verification as to their address of 1615 Washington. In an e-mail and attachment sent back to the school on September 17, 2008, Kristi Eastman provided a bank statement from Lincoln Savings Bank in Reinbeck, IA indicating an address of 1615 Washington Street, Cedar Falls, IA. The bank statement was titled in the names of Todd and Kristi Eastman.

In March of 2009, Todd Eastman obtained a driver's license with the residential address of 1615 Washington, Cedar Falls, IA despite the fact that he did not reside at that address. In letter dated September 11, 2008, a driver's license was a form of address verification requested by PLS. Mr. Eastman during an interview indicated that he resided, at least part time, at 1615 Washington Street, Cedar Falls, IA. He also indicated that there was a second dwelling at 1611 Washington Street, Cedar Falls, IA. During his interview Mr. Eastman stated that when his children visited him at the Washington Street residence they would stay at the property located at 1611 Washington Street. It was learned during the investigation that this was untrue. Alissa Wagner has rented the house at 1611 Washington from Barry Eastman since July of 2008. During the time she rented the property Todd Eastman has never resided there nor is she familiar with Todd Eastman or his children.

The address of 1615 Washington Street belongs to Barry Eastman. Barry Eastman indicated that the defendant and the Eastman children have never resided at either 1615 or 1611 Washington Street, Cedar Falls, IA. Barry Eastman indicated that he would occasionally receive mail for the children at his address which he would forward to the defendant. Prior to receiving the mail for the children he was told by Todd Eastman that he would be receiving mail for them from the PLS school.

Beginning with the 2006/07 and ending with the 2008/09 school year it was determined, based upon the proper per pupil fee, the Eastman's owed \$33,755 to the PLS.

IN THE IOWA DISTRICT COURT IN AND FOR BLACK HAWK COUNTY

STATE OF IOWA,)	
)	
Plaintiff,)	Case No. 01071 AGCR168180
)	
vs.)	SUMMONS
)	
TODD T EASTMAN)	
)	
Defendant,)	

TO: TODD T EASTMAN
1491 NEWELL ST
WATERLOO IA 50703

TO THE ABOVE NAMED INDIVIDUAL:

You are hereby ordered by the Court to appear on the first floor of the Black Hawk County Courthouse, Waterloo, Iowa, on the 22ND day of APRIL, 2010, at 8:30 A.M. for a INITIAL APPEARANCE with respect to a Complaint that has been filed charging you with the offense of TAMPERING W/RECORDS. You should report to the court attendant's desk outside the large courtroom on the first floor of the courthouse.

If you fail to so appear, a warrant for your arrest may be issued. Please take notice and govern yourself accordingly.

IT IS FURTHER ORDERED that the Black Hawk County Sheriff's Office provide the defendant with personal service of a copy of this order.

Dated 04/07/10

James D. Coil

DISTRICT ASSOCIATE JUDGE/
MAGISTRATE

Copies to: Sheriff

FILED
STATE OF IOWA, COUNTY OF BLACK HAWK
 2010 APR -7 AM 9:25

STATE OF IOWA

CLERK OF DISTRICT COURT CASE NO. AGCR168177
 BLACK HAWK COUNTY, IOWA

V.

COMPLAINT, AFFIDAVIT and ORDER

ANGIE LINN GILBERT,
 DOB: 01/16/1977

Count One

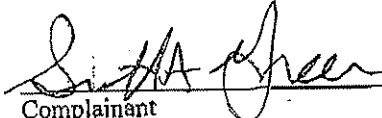
Comes Now the State of Iowa and accuses Angie L. Gilbert of the crime of **Tampering with Records**, an aggravated misdemeanor, committed as follows: the defendant on or about the 2nd Day of August, 2007, in the County of Black Hawk, State of Iowa, did commit tampering with records relating to CAG in violation of Section 715A.5 of the Iowa Criminal Code.

Count Two

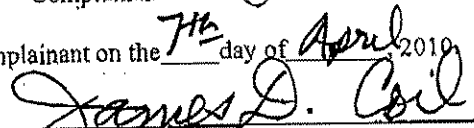

Comes Now the State of Iowa and accuses Angie L. Gilbert of the crime of **Tampering with Records**, an aggravated misdemeanor, committed as follows: the defendant on or about the 2nd Day of August, 2007, in the County of Black Hawk, State of Iowa, did commit tampering with records relating to KAG in violation of Section 715A.5 of the Iowa Criminal Code.

Count Three

Comes Now the State of Iowa and accuses Angie L. Gilbert of the crime of **Tampering with Records**, an aggravated misdemeanor, committed as follows: the defendant on or about the 2nd Day of August, 2007, in the County of Black Hawk, State of Iowa, did commit tampering with records relating to CG in violation of Section 715A.5 of the Iowa Criminal Code.



 Complainant

Subscribed and sworn to before me by the said complainant on the 7th day of April, 2010.

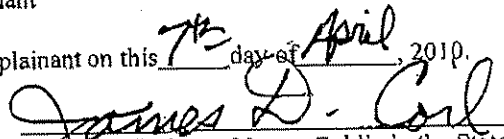

 Notary Public in the State of Iowa

 Judge

STATE OF IOWA,
 COUNTY OF BLACK HAWK, SS.

I, the undersigned, being first duly sworn and under oath, state that the following facts known by me or told to me by other reliable persons form the basis for my belief that the Defendant committed the crimes charged.
See Affidavit - Attachment A


 Affiant

Subscribed and sworn to before me by the said complainant on this 7th day of April, 2010.


 Magistrate/Judge or Notary Public in the State of Iowa

Court _____ Police _____ Prosecutor _____ Defendant _____

ORDER

It is ordered that a summons be issued by the Clerk of Court to the defendant at the last known address setting an appearance on the above referenced charge for the 22nd day of April 2010 at 8:30 a.m./~~pm~~

James D. Coil
Magistrate/Judge, First Judicial District
Black Hawk County, Iowa

Court_____

Police_____

Prosecutor_____

Defendant_____

FILED
IN THE IOWA DISTRICT COURT FOR BLACK HAWK COUNTY

2010 APR -7 AM 9:25

STATE OF IOWA

CLERK OF DISTRICT COURT
BLACK HAWK COUNTY, IOWA

CASE NO. _____

V.

AFFIDAVIT

ANGIE L. GILBERT

In March of 2009, information came to law enforcement that indicated a number of patrons of the Malcolm Price Laboratory School (K-6), hereinafter referred to as (PLS), located at the University of Northern Iowa were listing addresses on school records for their children that were false. The addresses were listed on enrollment and registration records of the PLS.

PLS is established pursuant to Iowa Code. PLS is an elementary school with a district or zone that is physically within the Cedar Falls School District. However, PLS is operated on a separate budget and is independent of Cedar Falls School District. NU High which is established under the same code section is likewise situated and operated.

Patrons of the PLS who live within a defined residential or buffer zone are allowed to send their children to the PLS for a fee of \$500 for the 2006/07 school year, \$526 for the 2007/08 school year and \$543 for the 2008/09 school year. Patrons who desire to send their children to PLS that live outside of the residential or buffer zone can do so by following the appropriate open enrollment procedure set by the Iowa Department of Education or by following a process called "tuitioning in". For a patron to "tuition-in" a student must receive permission of the PLS administration and pay the "per pupil fee" set by the legislature. For the 2006/07 school year the per-pupil fee was \$5,135.00. For the 2007-2008 school year the "per-pupil fee" set by the legislature was \$5,333.00. For the 2008-2009 school year the "per pupil fee" set by the legislature was \$5,500.00.

Patrons who listed a false residential address for their children thereby gained an educational benefit for their child that would not have otherwise been available, avoided paying higher fees in the form of tuition and avoided having to following open enrollment procedures.

Prior to the 2008/09 school year patrons were required to complete registration of existing students by filling out hard copy forms. To register a student who was an existing PLS student a "Registration and Information" form was required to be filed with the school. The form required the parent's and student's residential address, among other information. If the student was a first year student either beginning school or transferring from another district an "Enrollment Application and Transfer Form" was

required to be filed with the school. Similar to the registration form, the parent's and student's residential address, among other information, was required.

Beginning with the 2008/09 school year PLS used a computerized program to register students. The name of the program was *Power Schools*. According to Aaron Spurr of PLS who oversees the operation of the computer system each family was assigned one password. The password could be used to access the school account to register a student for the school year. During the registration process the parent is required to provide the residential address of the student and parent. In setting the appropriate fee, PLS relied on the information provided by the parent registering the student. The passwords were unique to each family and not individuals. There would be no way of telling which parent or guardian accessed the account to register the student only that it had been accessed with the assigned password.

In March/April of 2009, agents with the Iowa Division of Criminal Investigation assisted by the State Auditor's investigators conducted an investigation into the alleged false records. Initially, the information concerning false addresses had been discovered in an internal audit conducted by the University of Northern Iowa. School documents were inspected and copied and interviews of certain individuals including administrative staff members, parents and community members were completed.

As it relates to the above referenced defendant the following information was learned.

During the 2007/08 Angie L. Gilbert resided at 235 Denver Street, Waterloo, IA. She resided at the address with her husband and three children CAG, KAG and CG. It was learned that Gilbert resided at this address for 2 years prior to the 07/08 school year.

Gilbert attempted to open enroll her children out of the Waterloo Community School District but was denied.

One or more of the Gilbert children have attended PLS since the 2003/04 school year. The children were taken out of PLS for the 2009/10 school year when the family relocated to Texas.

On March 26, 2007, Angie Gilbert completed a form entitled "Enrollment Application and Transfer Form" to apply for the admission of CAG into PLS. On the form Gilbert listed an address for CAG of 1910 Clay Street, Cedar Falls, IA. Gilbert also completed a form dated August 2, 2007, for CAG entitled "Registration Information". On the form Gilbert listed a residential address of 1910 Clay Street, Cedar Falls, IA for herself and for CAG.

Gilbert completed a form dated August 2, 2007, for KAG entitled "Registration Information". On the form Gilbert listed a residential address of 1910 Clay Street, Cedar Falls, IA for herself and for KAG.

Gilbert completed a form dated August 2, 2007, for CG entitled "Registration Information". On the form Gilbert listed a residential address of 1910 Clay Street, Cedar Falls, IA for herself and for CG.

1910 Clay Street, Cedar Falls, IA is an address within the residential zone of the PLS.

The address of 1910 Clay Street belongs to Michael and Vicki Gilbert who are the grandparents of the aforementioned children. Ms. Gilbert indicated that the defendant and the Gilbert children have never resided at her home on Clay Street. Ms. Gilbert that she knew it was wrong to have the kids use her address but she did not want them to go to Waterloo schools.

The defendant was interviewed by an agent with the Iowa DCI. During the interview the defendant admitted to entering an address on registration records where her family did not reside. The defendant admitted to using the address to enable her children to be able to attend PLS.

It appears from school records obtained during the investigation that the defendant has always maintained on official school records that her children reside at 1910 Clay Street, Cedar Falls, IA.

Angie Gilbert and her family resided outside the PLS zone and should have "tuitioned-in" at the per pupil fee. From the 2003/2004 school year through 2008/2009 with proper fees applied minus the fees paid, the Gilbert's would owe \$47,701 to the PLS system.

IN THE IOWA DISTRICT COURT IN AND FOR BLACK HAWK COUNTY

STATE OF IOWA,)
)
Plaintiff,) Case No. 01071 AGCR168177
)
vs) SUMMONS
)
ANGIE LYNN GILBERT)
)
Defendant.)

TO: ANGIE LYNN GILBERT
235 DENVER ST
WATERLOO IA 50702

TO THE ABOVE NAMED INDIVIDUAL:

You are hereby ordered by the Court to appear on the first
floor of the Black Hawk County Courthouse, Waterloo, Iowa, on the
22ND day of APRIL , 2010 , at 8:30 A.M. for a
INITIAL APPEARANCE with respect to a Complaint that has been
filed charging you with the offense of TAMPERING W/RECORDS
You should report to the court attendant's desk outside the large
courtroom on the first floor of the courthouse.

If you fail to so appear, a warrant for your arrest may be
issued. Please take notice and govern yourself accordingly.

IT IS FURTHER ORDERED that the Black Hawk County Sheriff's
Office provide the defendant with personal service of a copy of
this order.

Dated 04/07/10 .



DISTRICT ASSOCIATE JUDGE/
MAGISTRATE

Copies to: Sheriff

FILED
STATE OF IOWA, COUNTY OF BLACK HAWK

2010 APR -7 AM 9:24

STATE OF IOWA

CLERK OF DISTRICT COURT
 BLACK HAWK COUNTY, IOWA

CASE NO. AGCR168175

V.

COMPLAINT, AFFIDAVIT and ORDER

STEPHANIE KAY HOVEY,

DOB: 07/24/1976

Comes Now the State of Iowa and accuses Stephanie K. Hovey of the crime of Tampering with Records, an aggravated misdemeanor, committed as follows: the defendant on or about the 17th Day of July, 2007, in the County of Black Hawk, State of Iowa, did commit tampering with records relating to OMH in violation of Section 715A.5 of the Iowa Criminal Code.

Stephanie K. Hovey
 Complainant

Subscribed and sworn to before me by the said complainant on the 4th day of April, 2010.

James D. Coil
 Notary Public in the State of Iowa

STATE OF IOWA,
 COUNTY OF BLACK HAWK, SS.

I, the undersigned, being first duly sworn and under oath, state that the following facts known by me or told to me by other reliable persons form the basis for my belief that the Defendant committed the crimes charged.
See Affidavit - Attachment A

Stephanie K. Hovey
 Affiant

Subscribed and sworn to before me by the said complainant on this 7th day of April, 2010.

James D. Coil
 Magistrate/Judge or Notary Public in the State of Iowa

ORDER

It is ordered that a summons be issued by the Clerk of Court to the defendant at the last known address setting an appearance on the above referenced charge for the 22nd day of April, 2010 at 8:30 a.m./p.m.

James D. Coil
 Magistrate/Judge, First Judicial District
 Black Hawk County, Iowa

Court _____

Police _____

Prosecutor _____

Defendant _____

FILED
IN THE IOWA DISTRICT COURT FOR BLACK HAWK COUNTY

2010 APR 7 AM 9:24

STATE OF IOWA

CLERK OF DISTRICT COURT
BLACK HAWK COUNTY, IOWA CASE NO. _____

V.

AFFIDAVIT

STEPHANIE KAY HOVEY

In March of 2009, information came to law enforcement that indicated a number of patrons of the Malcolm Price Laboratory School (K-6), hereinafter referred to as (PLS), located at the University of Northern Iowa were listing addresses on school records for their children that were false. The addresses were listed on enrollment and registration records of the PLS.

PLS is established pursuant to Iowa Code. PLS is an elementary school with a district or zone that is physically within the Cedar Falls School District. However, PLS is operated on a separate budget and is independent of Cedar Falls School District. NU High which is established under the same code section is likewise situated and operated.

Patrons of the PLS who live within a defined residential or buffer zone are allowed to send their children to the PLS for a fee of \$500 for the 2006/07 school year, \$526 for the 2007/08 school year and \$543 for the 2008/09 school year. Patrons who desire to send their children to PLS that live outside of the residential or buffer zone can do so by following the appropriate open enrollment procedure set by the Iowa Department of Education or by following a process called "tuitioning in". For a patron to "tuition-in" a student must receive permission of the PLS administration and pay the "per pupil fee" set by the legislature. For the 2006/07 school year the per-pupil fee was \$5,135.00. For the 2007-2008 school year the "per-pupil fee" set by the legislature was \$5,333.00. For the 2008-2009 school year the "per pupil fee" set by the legislature was \$5,500.00.

Patrons who listed a false residential address for their children thereby gained an educational benefit for their child that would not have otherwise been available, avoided paying higher fees in the form of tuition and avoided having to following open enrollment procedures.

Prior to the 2008/09 school year patrons were required to complete registration of existing students by filling out hard copy forms. To register a student who was an existing PLS student a "Registration and Information" form was required to be filed with the school. The form required the parent's and student's residential address, among other information. If the student was a first year student either beginning school or transferring from another district an "Enrollment Application and Transfer Form" was

required to be filed with the school. Similar to the registration form, the parent's and student's residential address, among other information, was required.

Beginning with the 2008/09 school year PLS used a computerized program to register students. The name of the program was *Power Schools*. According to Aaron Spurr of PLS who oversees the operation of the computer system each family was assigned one password. The password could be used to access the school account to register a student for the school year. During the registration process the parent is required to provide the residential address of the student and parent. In setting the appropriate fee, PLS relied on the information provided by the parent registering the student. The passwords were unique to each family and not individuals. There would be no way of telling which parent or guardian accessed the account to register the student only that it had been accessed with the assigned password.

In March/April of 2009, agents with the Iowa Division of Criminal Investigation assisted by the State Auditor's investigators conducted an investigation into the alleged false records. Initially, the information concerning false addresses had been discovered in an internal audit conducted by the University of Northern Iowa. School documents were inspected and copied and interviews of certain individuals including administrative staff members, parents and community members were completed.

As it relates to the above referenced defendant the following information was learned.

During the 2007/08 Stephanie Hovey resided at 919 Baltimore Street, Waterloo, IA. She resided at the address with her child OMH. Hovey and OMH's father are divorced. Beginning in June of 2007, Hovey resided at 810 Catherine Street, Cedar Falls, IA. This address is not in the residential or buffer zone of the PLS.

OMH has attended PLS since the 2007/08 school year.

Hovey completed a form to register OMH with PLS dated July 17, 2007, entitled "Registration Information". On the form Hovey listed a residential address for OMH and for herself of 1476 Laurel Street, Cedar Falls, IA.

1476 Laurel Street, Cedar Falls, IA is an address within the residential zone of the PLS.

The address of 1476 Laurel Street belongs to Jerry and Alma Backstrom who are the parents of Hovey. Hovey indicated during an interview that she was using her parent's address to drop off her son during her pending divorce. Hovey indicated that she was not aware of the additional tuition and fees. It appears that OMH nor Hovey resided at 1476 Laurel Street.

It appears from school records obtained during the investigation that the defendant has always maintained on official school records that OMH resided at 1476 Laurel Street, Cedar Falls, IA.

Stephanie Hovey was not approved for open enrollment and lived outside the PLS zone. When proper registration fees were applied, Stephanie Hovey owed tuition for the 2007/2008 and 2008/2009 school year in the amount of \$10,833. Minus the fees previously paid of \$1,006, Hovey owes a total of \$9,754 PLS system.

IN THE IOWA DISTRICT COURT IN AND FOR BLACK HAWK COUNTY

STATE OF IOWA,)	
)	
Plaintiff,)	Case No. 01071 AGCR168175
)	
vs)	SUMMONS
)	
STEPHANIE KAY HOVEY)	
)	
Defendant.)	

TO: STEPHANIE KAY HOVEY
 810 CATHERINE ST
 CEDAR FALLS IA 50613-2455

TO THE ABOVE NAMED INDIVIDUAL:

You are hereby ordered by the Court to appear on the first floor of the Black Hawk County Courthouse, Waterloo, Iowa, on the 22ND day of APRIL, 2010, at 8:30 A.M. for a INITIAL APPEARANCE with respect to a Complaint that has been filed charging you with the offense of TAMPERING W/RECORDS. You should report to the court attendant's desk outside the large courtroom on the first floor of the courthouse.

If you fail to so appear, a warrant for your arrest may be issued. Please take notice and govern yourself accordingly.

IT IS FURTHER ORDERED that the Black Hawk County Sheriff's Office provide the defendant with personal service of a copy of this order.

Dated 04/07/10


 DISTRICT ASSOCIATE JUDGE/
 MAGISTRATE

Copies to: Sheriff

FILED
STATE OF IOWA, COUNTY OF BLACK HAWK

2010 APR -7 AM 9:25

STATE OF IOWA

CLERK OF DISTRICT COURT CASE NO. ASCR 168178
 BLACK HAWK COUNTY, IOWA

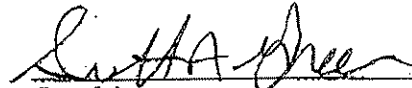
V.

COMPLAINT, AFFIDAVIT and ORDER

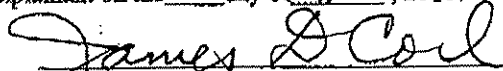
CHERYL ANNE LONGNECKER

DOB: 08/06/1962

Comes Now the State of Iowa and accuses Cheryl A. Longnecker of the crime of Tampering with Records, an aggravated misdemeanor, committed as follows: the defendant on or about the 17th Day of August, 2007, in the County of Black Hawk, State of Iowa, did commit tampering with records relating to PML in violation of Section 715A.5 of the Iowa Criminal Code.

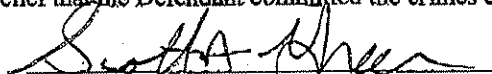

 Complainant

Subscribed and sworn to before me by the said complainant on the 7th day of April, 2010.

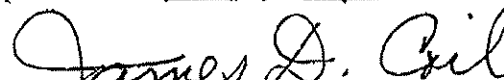

 Notary Public in the State of Iowa
 Judge

STATE OF IOWA,
 COUNTY OF BLACK HAWK, SS.

I, the undersigned, being first duly sworn and under oath, state that the following facts known by me or told to me by other reliable persons form the basis for my belief that the Defendant committed the crimes charged.
See Affidavit - Attachment A



 Affiant

Subscribed and sworn to before me by the said complainant on this 7th day of April, 2010.


 Magistrate/Judge or Notary Public in the State of Iowa

ORDER

It is ordered that a summons be issued by the Clerk of Court to the defendant at the last known address setting an appearance on the above referenced charge for the 22nd day of April 2010 at 8:30 a.m./p.m.


 Magistrate/Judge, First Judicial District
 Black Hawk County, Iowa

Court _____

Police _____

Prosecutor _____

Defendant _____

FILED

IN THE IOWA DISTRICT COURT FOR BLACK HAWK COUNTY

2010 APR -7 AM 9:25

STATE OF IOWA

CLERK OF DISTRICT COURT
BLACK HAWK COUNTY, IOWA

CASE NO. _____

V.

AFFIDAVIT

CHERYL ANNE LONGNECKER

In March of 2009, information came to law enforcement that indicated some patrons of the Malcolm Price Laboratory School (K-6), hereinafter referred to as (PLS), located at the University of Northern Iowa were listing addresses on school records for their children that were false. The addresses were listed on enrollment and registration forms provided by the PLS.

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Patrons of the PLS who live within a defined residential or buffer zone are allowed to send their children to the PLS for a fee of \$500 for the 2006/07 school year, \$526 for the 2007/08 school year and \$543 for the 2008/09 school year. Patrons who desire to send their children to PLS that live outside of the residential or buffer zone can do so by following the appropriate open enrollment procedure set by the Iowa Department of Education or by following a process called "tuitioning in". For a patron to "tuition-in" a student must receive permission of the PLS administration and pay the "per pupil fee" set by the legislature. For the 2006/07 school year the per-pupil fee was \$5,135.00. For the 2007-2008 school year the "per-pupil fee" set by the legislature was \$5,333.00. For the 2008-2009 school year the "per pupil fee" set by the legislature was \$5,500.00.

Patrons who listed a false residential address for their children thereby gained an educational benefit for their child that would not have otherwise been available, avoided paying higher fees in the form of tuition and avoided having to following open enrollment procedures.

Prior to the 2008/09 school year parents were required to complete registration of existing students by filling our hard copy forms. To register a student who was an existing PLS student a "Registration and Information" form was required to be filed with the school. The form required the parent's and student's residential address, among other information. If the student was a first year student either beginning school

or transferring from another district an "Enrollment Application and Transfer Form" was require to be filed with the school. Similar to the registration form, the parent's and student's residential address, among other information, was required.

Beginning in with the 2008/09 school year PLS used a computerized program to register students. The name of the program was Power Schools. According to Aaron Spur of PLS who oversees the operation of the computer system each family was assigned one password. The password could be used to access the school account to register a student for the school year. The school relied on the information provided by the patron registering the student. The passwords were unique to each family and not individuals. There would be no way of telling which parent or guardian accessed the account to register the student only that it had been accessed with the assigned password.

In March/April of 2009, agents with the Iowa Division of Criminal Investigation assisted by the State Auditor's investigators conducted an investigation into the listing of the false address. School documents were inspected and copied and interviews of certain individuals including administrative staff members, parents and community members were completed.

As it relates to the above referenced defendant the following information was learned.

Cheryl Longnecker resides at 5408 Norse Drive, Cedar Falls, IA an address outside the residential and buffer zone of PLS. Cheryl Longnecker is divorced from Jim Longnecker. Together they have a child at PLS whose initials are PML.

PML has attend PLS since the 2007/08 school year.

On August 17, 2007, Cheryl Longnecker completed a form entitled "Enrollment Application and Transfer Form" to apply for the admission of PML into PLS. On the form Longnecker listed an address for PML of 1901 18th Street, Cedar Falls, IA. Longnecker also completed a form dated August 7, 2007, for PML entitled "Registration Information". On the form Longnecker listed a residential address for PML of 1901 18th Street, Cedar Falls, IA.

1901 18th Street, Cedar Falls, IA is an address within the residential zone of the PLS. Neither Cheryl Longnecker, Jim Longnecker or PML have resided at 1901 18th Street, Cedar Falls, IA

It was learned during the investigation that 1901 18th Street, Cedar Falls, IA was an apartment complex named Point West. Cheryl Longnecker's older daughter Taylor Longnecker resided in the apartment complex in apartment C4. Law enforcement investigating the allegations attempted to make contact with the residents at apartment C4 but could get no one to answer the door. It was learned that two additional persons resided at apartment C4, John Williams and Cody Hashman.

Taylor Longnecker, Williams and Hashman were all interviewed. Each gave information indicating that PML was not a resident of 1901 18th Street Apartment C4, Cedar Falls, IA. Each also indicated that Jim Longneck and PML were occasional visitors to the apartment but were not a residents. None indicated that Jim Longnecker paid rent or any of the expenses associated with the apartment nor was he listed as a tenant on a lease.

Cheryl Longnecker indicated in her interview that PML resided at 1901 18th Street, Apartment C4, Cedar Falls, IA. Longnecker stated that because she lived outside the zone, Jim Longnecker lived at the apartments so PML could attend PLS. Cheryl Longnecker indicated that she and Jim Longnecker were getting divorced however it was not final

If proper fees were charged for school years 2007/2008 and 2008/2009 the proper fee would be \$11,902 minus fees paid of \$2,138. The proper fees currently owed by the Longneckers to PLS are \$9,764.

IN THE IOWA DISTRICT COURT IN AND FOR BLACK HAWK COUNTY

STATE OF IOWA,)	
)	
Plaintiff,)	Case No. 01071 AGCR168178
)	
vs)	SUMMONS
)	
CHERYL ANNE LONGNECKER)	
)	
Defendant.)	

TO: CHERYL ANNE LONGNECKER
 5408 NORSE DR
 CEDAR FALLS, IA 50613-7607

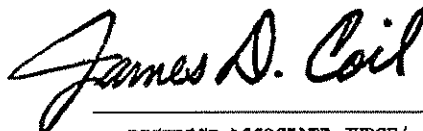
TO THE ABOVE NAMED INDIVIDUAL:

You are hereby ordered by the Court to appear on the first floor of the Black Hawk County Courthouse, Waterloo, Iowa, on the 22ND day of APRIL, 2010, at 8:30 A.M. for a INITIAL APPEARANCE with respect to a Complaint that has been filed charging you with the offense of TAMPERING W/RECORDS. You should report to the court attendant's desk outside the large courtroom on the first floor of the courthouse.

If you fail to so appear, a warrant for your arrest may be issued. Please take notice and govern yourself accordingly.

IT IS FURTHER ORDERED that the Black Hawk County Sheriff's Office provide the defendant with personal service of a copy of this order.

Dated 04/07/10 .



DISTRICT ASSOCIATE JUDGE/
 MAGISTRATE

Copies to: Sheriff